

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,

Plaintiff,

v.

DELL, INC.; GATEWAY, INC.; HEWLETT-PACKARD CO.;
ACER INC.; ACER AMERICA CORP.; AOC INTERNATIONAL;
ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.;
TPV INTERNATIONAL (USA), INC.; AU OPTRONICS CORP.;
AU OPTRONICS CORPORATION AMERICA
a/k/a AU OPTRONICS AMERICA, INC.; BENQ CORP.;
BENQ AMERICA CORP.; CHUNGHWA PICTURE TUBES, LTD.
a/k/a CHUNGHWA PICTURE TUBES CO.;
TATUNG CO.; TATUNG CO. OF AMERICA, INC.;
BOE HYDIS TECHNOLOGY CO., LTD.;
BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS;
COMPAL ELECTRONICS, INC.; HANNSTAR DISPLAY CORP.;
JEAN CO., LTD.; LITE-ON TECHNOLOGY CORP.;
LITE-ON, INC. a/k/a LITEON TRADING USA, INC.;
MAG TECHNOLOGY CO., LTD.;
MAG TECHNOLOGY USA, INC.;
PROVIEW INTERNATIONAL HOLDINGS, LTD.;
PROVIEW TECHNOLOGY, INC.;
PROVIEW ELECTRONICS CO., LTD.; and
QUANTA DISPLAY, INC.

Defendants.

C.A. No.: 05-27-SLR

Jury Trial Demanded

**GUARDIAN'S REPLY TO TPV TECHNOLOGY, LTD'S, TPV INTERNATIONAL
(USA), INC.'S AND ENVISION PERIPHERALS, INC.'S COUNTERCLAIMS**

Guardian Industries Corp. ("Guardian") replies to TPV Technology, LTD's, TPV International (USA), Inc.'s, and Envision Peripherals, Inc.'s (collectively, "TPV") counterclaims as follows:

REPLY TO COUNTERCLAIMS

1. Admitted.
2. Admitted.

3. Admitted.
4. Admitted.
5. Guardian admits that TPV's counterclaims include claims for declaratory judgment of non-infringement, invalidity, and enforcement and that this Court has jurisdiction over the subject matter of these particular counterclaims, but denies that the counterclaims have any merit and denies that TPV is entitled to any of the relief sought in their counterclaims or Prayer. Guardian denies any and all remaining averments in Paragraph 5 of TPV's counterclaims.
6. Guardian admits that venue is proper in this Court.
7. Guardian repeats and incorporates by reference its responses to paragraphs 1-5.
8. Guardian admits that there exists an actual controversy between Guardian and TPV concerning infringement of the '214, '187, '065 and '588 patents.
9. Denied.
10. Denied.
11. Denied.
12. Denied.

WHEREFORE Guardian respectfully submits that TPV's counterclaims should be dismissed, with costs assessed against TPV, and seeks such further relief as the Court deems appropriate.

* * * * *

Dated: August 8, 2005

/s/ Richard K. Herrmann
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of August, 2005, I electronically filed the foregoing document, **GUARDIAN'S REPLY TO TPV TECHNOLOGY, LTD'S, TPV INTERNATIONAL (USA), INC.'S AND ENVISION PERIPHERALS, INC.'S COUNTERCLAIMS**, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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Additionally, I hereby certify that on the 8th day of August, 2005, the foregoing document was served via email on the following non-registered participants:

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